



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

DEC 22 2014

REPLY TO THE ATTENTION OF

E-19J

Superintendent Craig Kenkel
United States Department of the Interior
National Park Service
Cuyahoga Valley National Park
15610 Vaughn Road
Brecksville, Ohio 44141

Re: Final White-tailed Deer Management Plan (Plan)/Final Environmental Impact Statement (EIS), Cuyahoga Valley National Park, Ohio - CEQ No. 20140343

Dear Superintendent Kenkel:

The U.S. Environmental Protection Agency (U.S. EPA) has reviewed the Final Plan/EIS for proposed white-tailed deer management in the Cuyahoga Valley National Park (National Park). Our review and comments are pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

The Plan/Draft EIS identified several adverse effects on ecosystem diversity from a large deer population and indicated a management plan for white-tailed deer is needed. After providing analysis of four alternatives in the Draft EIS and Plan, the Draft Plan/EIS indicated the NPS's preferred alternative to manage the deer population is Alternative D. The Final Plan/EIS indicates Alternative D continues to be the NPS's preferred alternative and environmentally-preferable alternative. Alternative D was selected as the environmentally-preferable alternative because it would best protect the biological and physical environment by ensuring an immediate reduction in deer population numbers that could be sustained with proven methods over the life of the plan. Alternative D would also best protect, preserve, and enhance the cultural and natural processes that support the National Park's forests and cultural landscapes by providing multiple management options to maintain low deer numbers. Although Alternatives C and D are very close in meeting the stated purpose and need, Alternative D was selected primarily because it provides the National Park with the ability to select the least environmentally damaging option as science and technology advance.

In our Draft Plan/EIS comment letter dated September 23, 2013, EPA rated the project as *Lack of Objections*. Based on our review of the Final Plan/EIS, we retain our lack of objections to the proposed project.

However, we take this opportunity to reiterate the one recommendation to enhance proposed management activities made in our 2013 letter. We recommended the addition of signage in various locations of high visitor use, particularly in areas where wildlife feeding frequently occurs. Signs exhibiting photographs of damage at deer browse line, the floral and faunal

species adversely effected by over-browsing and loss of ground cover, and anticipated results of deer management (e.g., regeneration of woody and herbaceous species) might increase visitor understanding of the National Park's proposed actions.

The NPS addressed this recommendation in Appendix F, Public Comment Analysis Report as part of the Final Plan/EIS. The NPS' response indicated it will consider the use of interpretive signs to inform the public about the need for the plan and to increase visitor understanding as part of visitor education and outreach. We appreciate a response to our recommendation, and encourage the NPS to commit to erecting signs to better inform the public concerning this issue.

Thank you for the opportunity to review and comment on proposed management actions in the National Park. Please inform us when the Record of Decision will be available. If you have any questions regarding the contents of this letter, please contact Kathleen Kowal of my staff at (312) 353-5206 or via email at kowal.kathleen@epa.gov.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Kenneth A. Westlake', with a large, sweeping flourish at the end.

Kenneth A. Westlake, Chief
NEPA Implementation Section
Office of Enforcement and Compliance Assurance

cc: Judi Perez, Acting Environmental Coordinator, USFS Eastern Region